

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

RICHARD CAMPBELL,)
)
Plaintiff,)
) Case No.
vs.) 1:17-cv-00129-MR-DLH
)
SHIRLEY TETER and SINCLAIR)
COMMUNICATIONS, INC.,)
)
Defendants.)
_____/

SHIRLEY TETER,)
)
Plaintiff,)
) Case No.
vs.) 1:17-cv-00256-MR-DLH
)
PROJECT VERITAS ACTION FUND,)
et al.,)
)
Defendants.)
_____/

ATTORNEYS' EYES ONLY

Rule 30(b)(6) VIDEOTAPE DEPOSITION OF
PROJECT VERITAS AND PROJECT VERITAS ACTION FUND

By and Through its Designee

RUSSELL JOSEPH VERNEY

(Taken by Defendant/Counter Plaintiff Shirley Teter)

Winston-Salem, North Carolina

Tuesday, November 20th, 2018

Reported by: Judy F. Reins, RMR, CRR

1 APPEARANCES

2 ON BEHALF OF RICHARD L. CAMPBELL:

3 TODD KING, Esquire (via telephone)
4 2907 Providence Road
Suite 200
5 Charlotte, North Carolina 28211
(704) 332-8300

6 ON BEHALF OF SHIRLEY TEETER:

7 JEREMY M. FALCONE, Esquire
JONATHAN D. SASSER, Esquire
8 PREETHA SURESH RINI, Esquire (via telephone)
Ellis & Winters LLP
9 4131 Parklake Avenue
Suite 400
10 Raleigh, North Carolina 27612
(919) 865-7000

11 - and -

12 RALPH STREZA, Esquire (via telephone)
13 Critchfield, Critchfield & Johnston, Ltd.
4996 Foote Road
14 Medina, Ohio 44256
(330) 723-6404

15 ON BEHALF OF PROJECT VERITAS and PROJECT VERITAS
16 ACTION FUND AND JAMES E. O'KEEFE, III:

17 JAMES A. DEAN, Esquire
MICHAEL MONTECALVO, Esquire
18 Womble Bond Dickinson LLP
One West Fourth Street
19 Winston-Salem, North Carolina 27101
(336) 721-3600

22 ALSO PRESENT:

23 Brad Cartner, Videographer

1 30(b)(6) VIDEOTAPE DEPOSITION OF PROJECT
2 VERITAS AND PROJECT VERITAS ACTION FUND, By and
3 Through its Designee, RUSSELL JOSEPH VERNEY, a witness
4 called on behalf of Defendant/Counter Plaintiff
5 Shirley Teter, before Judy F. Reins, Notary Public, in
6 and for the State of North Carolina, at the offices of
7 Womble Bond Dickinson LLP, One West Fourth Street,
8 Winston-Salem, North Carolina, on Tuesday, the 20th
9 day of November, 2011, commencing at 9:09 a.m.

1 outside of the scope of the noticed topic. I'm
2 just going to say same objection on that to save
3 time if that's all right with you all.

4 MR. FALCONE: That's fine.

5 BY MR. FALCONE:

6 Q. Does Project Veritas Action Fund have any
7 employees?

8 MR. DEAN: Same objection.

9 **THE WITNESS: No.**

10 BY MR. FALCONE:

11 Q. What is the business of Project Veritas?

12 MR. DEAN: Same objection.

13 **THE WITNESS: Project Veritas conducts**
14 **undercover video recordings of public officials**
15 **and organizations to expose unethical, immoral,**
16 **or illegal activities.**

17 BY MR. FALCONE:

18 Q. And has that been the business of Project
19 Veritas the entire time you've been with the company?

20 **A. Yes.**

21 MR. DEAN: Same objection. And Mr. Verney,
22 you have to give me time to give my objection out
23 before you answer. Hate to interrupt. Go ahead.

24 BY MR. FALCONE:

25 Q. Are you an employee or a contractor of

1 STATE OF NORTH CAROLINA
2 COUNTY OF FORSYTH

3 REPORTER'S CERTIFICATE

4 I, JUDY F. REINS, a Notary Public in and for
5 the State of North Carolina, do hereby certify that
6 there came before me on Tuesday, the 20th day of
7 November, 2018, the person hereinbefore named, RUSSELL
8 JOSEPH VERNEY, who was by me duly sworn or affirmed to
9 testify to the truth and nothing but the truth of his
10 knowledge concerning the matters in controversy in
11 this cause; that the witness was thereupon examined
12 under oath, examination reduced to typewriting under
13 my direction, and the deposition is a true record of
14 the testimony, to the best of my ability and
15 understanding, given by the witness.

16 I further certify that I am neither attorney
17 or counsel for, nor related to or employed by, any
18 attorney or counsel employed by the parties hereto or
19 financially interested in the action.

20 IN WITNESS WHEREOF, I have hereto set my
21 hand, this the 3rd day of December, 2018.

22 

23 JUDY F. REINS, RMR, CRR
24 Notary Public No. 20031970024
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